

**From:** Kristan Peters-Hamlin  
**To:** Koeltl NYSD Chambers  
**Cc:** [ichinn@proskauer.com](mailto:ichinn@proskauer.com); [dleon@proskauer.com](mailto:dleon@proskauer.com); [ntelman@proskauer.com](mailto:ntelman@proskauer.com); [spearlman@proskauer.com](mailto:spearlman@proskauer.com); Donnie Fletcher  
**Subject:** Re: Order Under Seal in No. 23-cv-613  
**Date:** Friday, January 27, 2023 1:35:21 PM

---

**CAUTION - EXTERNAL:**

CONSENT REQUEST TO FILE DECLARATION LATER THAN EXPECTED, TODAY

Dear Judge Koeltl,

I am writing this as an email instead of a motion because there is no Court order concerning the timing of the filing of Shipman's declaration.

I have addressed with opposing counsel and received their consent to file the Defendant's Declaration later today

on or before 9 pm, instead of at 3:30 pm..

In support hereof, defendant states as follows:

As the Court will recall, I indicated by email yesterday that I would have the declaration submitted by 3:30. I have just received the draft declaration from my client, and it needs organization so it is easier for the Court and opposing counsel to follow and compare it with the paragraphs of the plaintiff's declarants' declarations. I have a doctor's appointment today and therefore the delayed timing of my receiving this from my client will not permit me sufficient time to review it and put it in the proper shape.

Therefore, on consent of plaintiff's counsel, I respectfully request that the Court permit the Declaration to be filed by 9 pm tonight, instead of 3:30 pm.

Respectfully submitted,

Kristan Peters-Hamlin

Peters Hamlin Law, LLC

21 Compo Pkwy

Westport, CT

(203) 504-2050

[www.petershamlinlaw.com](http://www.petershamlinlaw.com)

*Under Seal*

*No. 23 - CV - 613*

*- Application to file the  
defendant's ~~affidavit~~  
declaration by  
9<sup>30</sup> p.m. today granted.  
So ordered.*

On Thu, Jan 26, 2023 at 11:44 AM Koeltl NYSD Chambers  
<[KoeltlNYSDChambers@nysd.uscourts.gov](mailto:KoeltlNYSDChambers@nysd.uscourts.gov)> wrote:

Good morning,

Please find attached an Order signed by Judge Koeltl, which will be filed under seal.

Thank you.

Chambers of the Hon. John G. Koeltl

*1/27/26*  
*[Signature]*  
*U.S.D.J.*